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Dated: April 25, 2022

MOTION TO CONTINUE

VIA ECF

Hon. Judge Ronnie Abrams
Hon. Magistrate Judge Katharine H. Parker
U.S. District Court
40 Foley Square
New York, NY 10007

Re: Shu Juan Liu v. Five Stars Beauty Spa Inc. et al
Case No.: 21-CV-11101

Dear Hon. Judge,

We are counsel to the Plaintiff, Shu Juan Liu, and we write to request extension to file Motion for Default Judgment from April 25, 2022 to May 25, 2022 for approximately thirty (30) days.

Our office is noticed by your honorable court to move default judgment, together with filing Motion for Default Judgment on or before April 25, 2022. See ECF Dkt 10.

The reason for the extension is that our office's capacity has been seriously affected by the Covid 19 and flu pandemic recently, and our office has been extremely busy with other clients' issues. It is unable for us to dedicate the time required in which to prepare a competent motion for default judgment. The filing of a cursory motion would do the Plaintiff an injustice. Therefore, we require additional time to finish the brief.

No other deadlines will be affected by this extension. This motion will not unduly burden Defendants.

We thank the court for its consideration of this request.

Dated: April 25, 2022

Respectfully Submitted,

J. Zhang and Associates, P.C.

/s/ Jiyuan Zhang

By: Jiyuan Zhang, Esq

CC: Five Stars Beauty Spa Inc (by first-class mail)
Shenhua Wang (by first-class mail)
Xia Zhou (by first-class mail)

Application granted.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'RA' followed by a long horizontal stroke.

Hon. Ronnie Abrams
4/26/22